

REMARKS/ARGUMENTS

1. Claims 1-20 were pending. Claim 11 has been amended. No claims have been canceled, and no new claims have been added. Thus, claims 1-20 remain pending. Applicant respectfully requests reconsideration of the claims in view of the following comments.

2. The Examiner has rejected claims 1-10, 13, 14, 15, 18, and 19 under 35 U.S.C. 103(a) as being unpatentable over Chang or Ohta in combination with Gallick or Haserodt.

Chang and Ohta disclose internet telephony devices (a multi-line phone in the case of Chang and a terminal adapter in the case of Ohta) that provide some level of call control via the DTMF keypad. Gallick and Haserodt disclose internet telephony feature servers. With regard to, the Examiner argues that it would have been obvious to integrate telephone line features that are situated in an internet telephony gateway, as disclosed by Gallick and Haserodt, into Chang or Ohta's internet telephony devices.

In order for the Examiner to establish a prima facie case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings (MPEP 2142). Not only is there no suggestion or motivation to modify or combine references as argued by the Examiner, but Gallick and Haserodt actually teach away from such modification or combination.

In Gallick, the feature server 160 regulates communications connections among and between the computer terminals, the VoIP telephones, and the PSTN-to-IP gateway, including returning the IP address of a called party to the calling party (see column 2, line 46 through column 4, line 6). Such regulatory function

is necessarily performed by a server that is separate from and accessible to the other devices. Thus, Gallick teaches away from the modification or combination suggested by the Examiner by requiring his feature server to be separate from the other devices.

In Haserodt, the entire focus of the patent is for internet telephony client devices to access server-based telephony features in a platform-independent and network-independent fashion without any modification of the internet telephony client devices themselves (see Abstract, first sentence). As in Gallick, Haserodt's feature server is necessarily separate from and accessible to the other devices; otherwise, it would not be server-based, would not be accessible in a platform-independent and network-independent fashion, and would require modification of the clients. Thus, Haserodt teaches away from the modification or combination suggested by the Examiner by requiring his feature server to be separate from the other devices.

Applicants therefore respectfully submit that claims 1-10, 13, 14, 15, 18, and 19 are allowable over Chang or Ohta in combination with Gallick or Haserodt.

3. The Examiner rejected claims 11, 12, 16, 17, and 20 under 35 U.S.C. 102(e) as being unpatentable over Chang or Ohta.

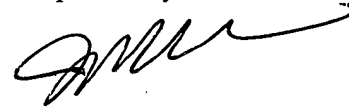
Claim 11 has been amended solely to clarify that the means for directing telephone calls and managing telephone services relates to an integral personal internet telephony feature server, as discussed throughout the subject patent application. The Examiner has recognized, with reference to the rejection of claims 1-10, 13, 14, 15, 18, and 19, that the internet telephony devices of Chang and Ohta do not include integral internet telephony feature servers.

4. Applicant believes that the application is in condition for allowance and requests that a notice of allowance be issued without delay, especially in light of the fact that issuance of this application has already been withdrawn once.

5. The applicants do not believe any extension of time is required for timely consideration of this response. In the event that an extension has been overlooked, this conditional petition of extension is hereby submitted, and Applicants request that deposit account number 19-4972 be charged for any fees that may be required for the timely consideration of this application.

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Respectfully submitted,



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